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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

ROSA MARTINEZ, JIMMY HOWARD,  
ROBERTA DOBBS, BRENT  
RODERICK, SHARON ROZIER, and  
JOSEPH SUTRYNOWICZ, on behalf of  
themselves and all others similarly situated,

CASE NO. 08-CV-4735 CW

**STIPULATION AND [PROPOSED]  
ORDER SETTING ACCELERATED  
BRIEFING AND HEARING SCHEDULE  
ON MOTION TO INTERVENE  
(LOCAL RULE 6-2)**

Plaintiffs,  
vs.  
MICHAEL J. ASTRUE, Commissioner of  
Social Security, in his official capacity,  
Defendant.

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14      Of Counsel for Plaintiffs ROSA MARTINEZ,  
15      JIMMY HOWARD, ROBERTA DOBBS, BRENT  
16      RODERICK, SHARON ROZIER, JOSEPH  
17      SUTRYNOWICZ, and all others similarly situated

1                   WHEREAS, on August 12, 2009, the Court granted preliminary approval of the  
 2 proposed class action settlement in this case;

3                   WHEREAS, the Court ordered that objections to the proposed class action  
 4 settlement should be filed not later than Thursday, September 10, 2009, and that a fairness  
 5 hearing for final approval of the settlement should be held on Thursday, September 24, 2009;

6                   WHEREAS, on September 10, 2009, Counsel for the County of Santa Clara filed  
 7 objections to the proposed class action settlement in this case (“Santa Clara Objections”), together  
 8 with a motion to intervene in this action (“Motion to Intervene”);<sup>1</sup>

9                   WHEREAS, the County of Santa Clara noticed its Motion to Intervene for a  
 10 hearing on October 15, 2009;

11                  WHEREAS, Plaintiffs, Defendant, and the County of Santa Clara agree that the  
 12 Motion to Intervene should be considered in connection with the Santa Clara Objections and the  
 13 Court’s evaluation of the proposed class action settlement at the fairness hearing scheduled for  
 14 Thursday, September 24, 2009;

15                  NOW, THEREFORE, IT IS HEREBY STIPULATED that Plaintiffs and  
 16 Defendant shall file any opposition to the Motion to Intervene not later than Friday, September  
 17 18, 2009; that the County of Santa Clara shall file any reply in support of the Motion to Intervene  
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<sup>1</sup> The County of Santa Clara has also filed a motion for administrative relief for an extension of  
 27 time to file amended or additional objections. *See* Dkt. No. 152. This stipulation does not affect  
 28 the County’s motion for administrative relief, which remains pending before the Court, and to  
 which Plaintiffs and Defendant have responded, *see* Dkt. Nos. 158 & 160. Nor does it impose a  
 schedule for briefing in response to any objections that the Court may allow the County to file.

1 not later than Monday, September 21, 2009; and that a hearing on the Motion to Intervene shall  
2 be held in connection with the fairness hearing on Thursday, September 24, 2009, at 2:00 p.m.

3 IT IS SO STIPULATED.

4 DATED: September 15, 2009

5 MUNGER, TOLLES & OLSON LLP  
Attorneys for Plaintiffs

9 DATED: September 15, 2009

10 UNITED STATES ATTORNEY  
JOSEPH P. RUSSONIELLO  
11 Attorney for Defendant

12 DATED: September 15, 2009

13 By: /s/ Victoria R. Carradero  
VICTORIA R. CARRADERO  
14 ASSISTANT UNITED STATES ATTORNEY  
15 OFFICE OF THE COUNTY COUNSEL  
MIGUEL MARQUEZ  
16 Attorney for County of Santa Clara

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 Dated: September 16, 2009

22   
23 THE HONORABLE CLAUDIA WILKEN  
24 United States District Judge